

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001

No. 03-MD-1570 (RCC)

KATHLEEN ASHTON, et al.,

No. 02-CV-6977 (RCC)

PLAINTIFFS,

V.

AL QAEDA ISLAMIC ARMY, et al.,

DEFENDANTS.

**DEFENDANT SAUDI BINLADIN GROUP'S
MOTION TO DISMISS THE COMPLAINT OR IN THE
ALTERNATIVE FOR MORE DEFINITE STATEMENT**

Defendant Saudi Binladin Group (“SBG”) hereby respectfully moves this Court for an order dismissing Plaintiffs’ Third Amended Consolidated Master Complaint pursuant to Federal Rules of Civil Procedure 12(b)(2) and 12(b)(6). In the alternative, Defendant SBG moves the Court for an order requiring a more definite statement under Federal Rule of Civil Procedure 12(e). A memorandum of law accompanies this motion.

Dated: March 19, 2004

Respectfully submitted,

/s/ E. Michael Bradley

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¹ All counsel from Jones Day's Washington office have been admitted Pro Hac Vice.

CERTIFICATE OF SERVICE

I hereby certify that on the 19th day of March, 2004, I caused a true and correct copy of Defendant Saudi Binladin Group's Motion to Dismiss the Complaint or in the Alternative for More Definite Statement to be served: (1) by the Court's Electronic Case Filing System upon all parties scheduled for electronic notice; and (2) by Federal Express upon all parties designated for hard-copy service by the Court's Electronic Filing System.

Dated: March 19, 2004

/s/ E. Michael Bradley

E. Michael Bradley (EB-7822)